

Eliot A. Adelson (SBN 205284)
James Maxwell Cooper (SBN 284054)
KIRKLAND & ELLIS LLP
555 California Street, 27th Floor
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
Email: eadelson@kirkland.com
Email: max.cooper@kirkland.com

James H. Mutchnik, P.C. (*pro hac vice*)
Barack Echols (*pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: jmutchnik@kirkland.com
Email: bechols@kirkland.com

Attorneys for Defendants
HITACHI, LTD., HITACHI DISPLAYS, LTD.
(n/k/a JAPAN DISPLAY INC.), HITACHI
AMERICA, LTD., HITACHI ASIA, LTD.,
AND HITACHI ELECTRONIC DEVICES
(USA), INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. Master File No. 3:07-cv-05944-SC
MDL NO. 1917

This Document Relates to:

*Costco Wholesale Corporation v. Hitachi,
Ltd., et al.*, No. 3:11-cv-06397-SC;

Costco Wholesale Corp. v. Technicolor SA, et al.,
Individual Case no. 13-cv-05723

*CompuCom Systems, Inc. v. Hitachi, Ltd., et
al.*, Individual Case No. 11-cv-06396

Office Depot Inc. v. Hitachi Ltd., et al.,
Individual Case No. 11-cv-06276

**DECLARATION OF JAMES MAXWELL
COOPER IN SUPPORT OF
DEFENDANTS' JOINT REPLY TO
COSTCO'S OPPOSITION TO (1)
DEFENDANTS' JOINT MOTION FOR
PARTIAL SUMMARY JUDGMENT
AGAINST CERTAIN DIRECT ACTION
PLAINTIFFS ON DUE PROCESS
GROUNDS [ECF NO. 3029] AND (2)
DEFENDANTS JOINT MOTION FOR
PARTIAL SUMMARY JUDGMENT
AGAINST COSTCO ON CHOICE OF
LAW GROUNDS [ECF No. 2997]**

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

COOPER DECLARATION RE DEFENDANTS' JOINT
REPLY TO COSTCO'S OPPOSITION TO DEFENDANTS'
JOINT MOTIONS FOR SUMMARY JUDGMENT

CASE No.: 3:07-cv-05944-SC
MDL No.: 1917

1 I, James Maxwell Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and the Northern
3 District of California. I am an associate with the firm of Kirkland & Ellis LLP, and counsel for
4 Hitachi, Ltd., Hitachi Asia, Ltd., Hitachi America, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display
5 Inc.), and Hitachi Electronic Devices (USA), Inc. (collectively, the "Hitachi Defendants"). I submit
6 this Declaration in Support of Defendants' Joint Reply to Costco's Opposition to (1) Defendants'
7 Joint Motion for Partial Summary Judgment Against Certain Direct Action Plaintiffs on Due Process
8 Grounds [ECF No. 3029] and (2) Defendants Joint Motion for Partial Summary Judgment Against
9 Costco on Choice of Law Grounds [ECF No. 2997] ("Reply"). Except for those matters stated on
10 information and belief, about which I am informed and which I believe to be true, I have personal
11 knowledge of the matters set forth herein, and could and would testify competently to each of them.

12 2. [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 I declare under penalty of perjury under the laws of the United States of America that the
27 foregoing is true and correct.
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1 DATED: January 23, 2015

By: /s/ James Maxwell Cooper

2 Eliot A. Adelson
3 James Maxwell Cooper
4 KIRKLAND & ELLIS LLP
5 555 California Street, 27th Floor
6 San Francisco, CA 94104
7 Telephone: (415) 439-1400
8 Facsimile: (415) 439-1500
9 Email: eadelson@kirkland.com
10 Email: max.cooper@kirkland.com

11 Attorneys for Defendants
12 HITACHI, LTD., HITACHI DISPLAYS,
13 LTD. (n/k/a JAPAN DISPLAY INC.),
14 HITACHI AMERICA, LTD., HITACHI
15 ASIA, LTD., AND HITACHI
16 ELECTRONIC DEVICES (USA), INC.
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